UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

MEMORANDUM:

To: Carmen Rodia

From: Helen Hull-Sanders, Ph.D.

Secondary Review: Jacquelyn Herrick, M.S.

Date: 6/16/2017

Subject: PRODUCT PERFORMANCE DATA EVALUATION RECORD (DER)

THIS DER DOES NOT CONTAIN CONFIDENTIAL BUSINESS INFORMATION

Note: MRIDs found to be **unacceptable** to support label claims should be removed from the data matrix.

DP barcode:	439431
Decision no.:	524532
Submission no:	996155
Action code:	R340
Product Name:	TC 283
EPA Reg. No or File Symbol:	499-557
Formulation Type:	Cellulose matrix termite bait

Ingredients statement from the label with PC codes included:
Novaluron: 1-[3-chloro-4-(1,1,2-trifluoro-2-methoxyethoxy)phenyl]-3-(2,6-difluorobenzoyl) urea 0.50%
PC: 124002

Application rate(s) of product and each active ingredient (lbs. or gallons/1000 square feet or per acre as appropriate; and g/m^2 or mg/cm^2 or mg/kg body weight as appropriate): 93g cartridge /<20 ft. for 90-day inspection interval or 124g cartridge/<20 ft. for 120-day inspection interval (one cartridge placed in a single bait station placed within the soil at intervals not to exceed 20 ft)

Use Patterns: Install stations around a structure such that, except where sufficient, access to the ground is not available, the maximum interval between any two stations does not exceed 20 ft. Inspection intervals are dependent upon cartridge size and termite activity. One 93g cartridge should be inspected every 90 days until no termite activity is recorded for ≥ 1 year, then every 6 months thereafter. One 124g cartridge should be inspected every 120 days until no termite activity is recorded for ≥ 1 year, then every 6 months thereafter. Two 93g cartridges **OR** one 93g + one 124g cartridges **OR** two 124g cartridges should be inspected annually.

I. Action Requested: Review data submitted to amend existing label adding an annual inspection interval and add the alternate brand name **TRELONA ATBS ANNUAL INSPECTION STATIONS**.

II. Background: Trelona is already a registered product and has been reviewed and approved for use as a termiticide and the purpose of this action is to determine if an annual inspection interval is acceptable. Registrant submitted two field efficacy studies, one of which provided 12+ month aged Trelona Bait Cartridges for laboratory termite feeding bioassays.

III. MRID Summary: Five MRIDs were submitted in support of adding an annual inspection interval to an

existing product.

MRID 50032001. Field Efficacy of Trelona Compressed Termite Bait (Novaluron) when Presented to Foraging Subterranean Termites in the Advance Termite Bait System (ATBS) Installed Around Living Trees (Grid Study) and Field Analysis of New Station Housing Material.

(1) non-GLP

(2) **Methods:** Fifty-six oak trees in Chalmette, LA, were used to evaluate efficacy of novaluron. Five Advance Termite Bait System stations were installed around each tree. Each station contained two 93g Termite Inspection Cartridges (TICs). Stations were inspected by the New Orleans Termite Control Board personnel monthly for three months. Assessment was made to determine colony size and distribution. Within the three-month monitoring phase, additional bucket traps were installed at the base of 11 trees that exhibited actively foraging termites within their corresponding stations. Buckets were to act as monitoring points for aggregation, collection of termite samples, and activity analysis. Each bucket was loaded with TICs and wood Termite Monitoring Bases. At 90-day post-installation, TICs were replaced with Trelona Termite Bait Cartridges (TBCs) in stations where there was evidence of termite activity (either 100% consumption of one or both TICs or visible presence of foraging termites). Some trees had multiple baited stations. Baited stations were inspected quarterly for one year. Termite voucher specimens were collected from buckets and ATBS stations for DNA analysis.

Thirteen trees (17 ATBS stations) were baited on 10/28/14 and monitored for feeding activity and the quantity of termites found quarterly during the course of a year. One tree was baited on 1/29/15 and monitored for feeding activity and the quantity of termites found quarterly for nine months. Six ATBS stations associated with six separate trees that had activity during the second quarter were designated as control trees and monitored for feeding activity and the quantity of termites during the third and fourth quarter of the observation year. In addition, eight of the eleven bucket monitoring points were baited on 10/28/14.

(3) **Results:** At the first quarterly inspection, six ATBS stations had 100% consumption of the TBCs and the TBCs were not subsequently replaced. At the second quarterly inspection, two additional ATBS stations had 100% consumption. At the third and fourth quarterly inspections, a single ATBS station recorded 100% consumption for each time period. Four stations had a steady increase in activity over the four quarters, but did not reach 100% consumption. No termites were seen actively foraging after the first quarter.

Table 1. Summary of all baited stations and their associated termite activity during each inspection

Station	Baited	Colony	Quarter 1		Quarter 2		Quarter 3		Quarter 4	
			Feeding (%)	Quantity termites	Feeding (%)	Quantity termites	Feeding (%)	Quantity termites	Feeding (%)	Quantity termites
3C	10/28/14	1	90	50	100	0	100	0	100	0
3D	10/28/14	2	0	0	0	0	0	0	0	0
5B	10/28/14	3	0	0	0	0	20	0	20	0
16D	10/28/14	4	100	0	100	0	-	-	-	-
28E	10/28/14	5	90	100	95	0	95	0	100	0
29B	10/28/14	5	25	225	100	0	100	0	100	0
33C	10/28/14	6	100	0	100	0	100	0	100	0
41C	10/28/14	7	25	50	50	0	50	0	50	0
42E	10/28/14	7	100	0	100	0	100	0	100	0
46B	10/28/14	8	100	0	100	0	100	0	100	0
46C	10/28/14	8	100	0	100	0	100	0	100	0
47A	10/28/14	8	70	0	70	0	75	0	95	0
47D	10/28/14	8	0	0	5	0	5	0	5	0
48A	10/28/14	9	0	0	55	0	60	0	75	0
48E	10/28/14	9	0	0	0	0	0	0	20	0
49B	10/28/14	9	100	0	100	0	100	0	100	0
50A	1/29/15	10	-	-	95	0	100	0	100	0
53E	10/28/14	11	0	0	-	-	0	0	0	0

Four bucket monitoring stations that had been baited on 10/28/14 exhibited activity during the first quarter. No buckets had activity during the second quarter and only one bucket (not baited on 10/28/14) had activity during the third/fourth quarter.

Table 2. Summary of all buckets and their associated termite activity during each inspection.

Bucket	Tree	Colony	Installed	Baited	Termite Activity (0-5)			
					Q1	Q2	Q3	Q4
1	3	12	8/25/14	10/28/14	1	0	0	0
2	29	5	8/25/14	10/28/14	100% consumed	0	0	0
3	41	7	8/25/14	10/28/14	0	0	0	0
4	46	8	8/25/14	10/28/14	3	0	0	0
5	48	9	8/25/14	10/28/14	3	0	0	0
6	54	13	8/25/14		0	0	0	0
7	4	14	9/26/14		0	0	0	0
8	16	4	9/26/14	10/28/14	0	0	0	0
9	21	15	9/26/14		0	0	100% consumed	100% consumed
10	28	5	9/26/14	10/28/14	0	0	0	0
11	42	7	9/26/14	10/28/14	0	0	0	0

Three of six control stations had termite activity during the third quarter. During the fourth quarter, one station that had previous activity (75% consumption) exhibited complete TBC removal; one station that did not have activity in the third quarter had 50% TBC removal; one station that had 100% consumption in the third quarter also had 100% in the fourth quarter; and one station that had 100% consumption in the third quarter had 0% in the fourth quarter.

Table 3. Summary of all stations associated with control colonies and the observed termite activity during third and fourth quarter inspections.

Station	Colony	First hit	Q3		Q4	
			Feeding (%)	Quantity Termites	Feeding (%)	Quantity Termites
22C	C1	Q2	75	300	100	0
23B	C1	Q2	0	0	50	0
39E	C2	Q2	0	0	0	0
40E	C3	Q2	100	0	100	3
52B	C4	Q2	0	0	0	0
54A	C5	Q2	100	10	0	0

DNA microsatellite analysis: Tables 1 & 2 indicate that 15 unique colonies were identified. During the second quarter inspection, termites observed within the six stations (subsequently designated as controls) were also subjected to DNA analysis. These samples were from five colonies that were different from those already identified.

(4) **Conclusion: Unacceptable.** Trelona is already a registered product and has been reviewed and approved for use as a termiticide. The protocol described in OPPTS 810.3800 Methods for Efficacy Testing of Termite Baits indicates that 100 structures with a minimum of five bait stations should be used to determine efficacy. It is assumed that the Registrant placed five bait stations around 56 trees in partial requirement for the efficacy testing.

These data were deficient for the following reasons:

1) A tree is not a suitable surrogate for a house (i.e. the scale is inappropriate). Only 14 trees exhibited termite activity when the baits were set into the ATBS stations. Assuming that the registrant is defining a single tree as a "structure," only 14 trees could be considered for efficacy testing.

2) Sampling buckets should not have been baited. It is also unclear the purpose of the bucket traps. Normally, these traps are used to monitor the population and for collection of foraging termites for population/DNA analysis (see OPPTS 810-3800, pg 5-6). The bucket traps, however, were baited on the same day as the ATBS stations. In essence, they were used as unstructured ATBS stations that could be disturbed, but would not provide information other than the colony identification.

3) DNA loci were not identified.

4) Alignment methods for the DNA were not described. No raw data or other information were provided to determine how the colonies were determined (what loci were used, how they were aligned, etc.).

5) Raw data were not provided.

These data do not support an increased inspection interval and do not contribute to the library of efficacy data.

MRID 50032002. Summary of Field-Agent Trelona Compressed Termite Bait Using a Laboratory Bioassay.

(1) Non-GLP

(2) **Methods:** Bait cartridges installed in Advance Termite Bait System (ATBS) stations as part of a structural efficacy study (see MRID 50032003 reviewed below) were collected after 12+ months. Cooperators collected cartridges that represented the highest (most decayed) and lowest (least decayed) mold ratings and sent them to the lab for analysis. Ten cartridges of the high rating and ten cartridges of the low rating were exposed to termites along with a single unaged bait cartridge and an unaged blank cellulose cartridge.

Feeding arenas consisted of 100 X 20 mm polystyrene dishes filled to ~ 5 mm depth with QuickStone Laboratory Stone. QuickStone was cured for 24 hours before adding 5 ml purified water to each arena. Each cartridge was cut into 4-6 sections. A single uniformly sized bait section (~0.25 g) was placed individually into modified 4 X 4 cm plastic weigh boats (two opposite side walls were cut out to allow termite access to the interior). A 5% agar plug was added to each arena as a water source. For each cartridge tested, this was replicated a minimum of four or a maximum of six times.

One hundred Formosan subterranean termites (*Coptotermes formosanus*), field collected from New Orleans, LA, were transferred to each arena. Termites were allowed to feed for 19 days, then assessed for mortality. Bait sections were weighed prior to termite introduction and again 56 days after termite consumption ended.

(3) **Results:** Approximately 16% of the mortality data were not included due to arenas that experienced high fungal growth. Termite mortality was 56.83% (± 2.12% S.E.) after 19 days of exposure to TBC that had low fungal growth in the field. Termite mortality was 55.86% (± 1.83 S.E.) after 19 days of exposure to TBC that had high fungal growth in the field. Termite mortality was 28.5% (± 6.57% S.E.) on unaged blank cartridges and 60% (± 4.26% S.E.) on unaged baited cartridges.

(4) **Conclusions: Acceptable.** There was no difference in percent mortality between TBC with low and high fungal growth ($F_{1,97} = 0.4579$, $p = 0.8373$) and <4% difference on unaged baited cartridges. While the design was unequal (future studies should ensure that an equal number of positive and negative controls are tested against the treated), mortality was much lower on unaged blank cartridges. These data support an increased inspection interval demonstrating significantly similar termite mortality between the aged bait cartridges and the unaged bait cartridges and significantly greater termite mortality than blank cartridges.

MRID 50032003. Summary of Field Research Conducted in 2014-2016 to Evaluate Control of Termites Using Trelona Compressed Termite Bait as an Annually-Inspected-In-Ground Termite Bait.

(1) Non-GLP

(2) **Methods:** Fifty structures with subterranean termite activity were treated using the Advance Termite Bait System (ATBS) stations placed at intervals around the infested structure. Each ATBS station had two 93 g Trelona Termite Bait Cartridges (0.5% novaluron) plus a wooden Termite Monitoring Base. After initial installation, ATBS stations were monitored every 1-3 months until activity was detected in at least one

station at each site. Most stations were left undisturbed for 12 months (±45 days) and then re-inspected for termite activity.

Stations were monitored for termites (number of visually active termites), feeding activity (0-4 scale), mold activity (0-4 scale), and mold color. Inspectors also made notes of other activity within the ATBS station. At the end of the study, aged bait cartridges with high and low mold/decay ratings were submitted to the laboratory for bioassays and chemical analysis of the active ingredient (see MRIDs 50032002, -04, and -05).

(3) **Results:** At the end of the study, 49 structures were verified by inspectors to be termite free. Four stations, one in Florida and three in New Jersey, had termite activity during the final inspection. One structure in Florida was determined to have active termites. The New Jersey activity was associated adjacent to the structure and not within the structure. The mean number of cartridges consumed per site was 3.0 (38 stations had both cartridges >75% consumed, 28 stations had at least one cartridge >75% consumed).

(4) **Conclusions: Acceptable.** The data provided were in accordance with the protocol described in OPPTS 810.3800 Methods for Efficacy Testing of Termite Baits, although the guidance indicates that 100 structures with a minimum of five bait stations should be used to determine efficacy; however, Trelona is already a registered product and has been reviewed and approved for use as a termiticide and the purpose of this action is to determine if an annual inspection interval is acceptable. These structures provided the aged bait cartridges for confirmation of palatability and one-year efficacy lab tests. These data support the annual inspection interval proposed by the registrant. Structures included in this study did not have subsequent infestation within the year that bait stations were employed.

Structural Protection Observed: Termite activity was observed within 1 of the 50 structures in the study that were monitored at a one-year interval. The structure that had termite activity was also treated by the homeowner with a secondary product within the one-year interval. So, there was no opportunity to determine if the bait would control the infestation. This information should be submitted to the agency under the FIFRA 6(a)(2) reporting requirements, but alone is not indicative of product failure warranting agency response.

MRID 50032004. Chemical Analysis of Field-Aged Trelona Compressed Termite Bait.

(1) Non-GLP

(2) **Methods:** Bait cartridges installed in Advance Termite Bait System (ATBS) stations as part of a structural efficacy study (see MRID 50032003 reviewed above) were collected after 12+ months. Cooperators collected cartridges that represented the highest (decay) and lowest (decay) mold ratings and sent to the lab for chemical analysis of the active ingredient. Ten cartridges of the high rating and ten cartridges of the low rating were submitted to the BASF quality assessment laboratory along with a single unaged bait cartridge and an unaged blank cellulose cartridge.

(3) **Results:** Cartridges with a low mold rating were found to have a mean novaluron content of 0.44% (± 0.04 SD). Cartridges with a high mold rating were found to have an average novaluron content of 0.53% (± 0.21 SD). The deviation away from the expected (0.50%) appears to be driven by the samples submitted by inspectors in Florida. All samples from Florida were >0.5%. An unaged bait cartridge sample had 0.44% novaluron.

(4) **Conclusions: Acceptable**. Aged cartridges had a similar novaluron content to unaged cartridge samples. The data support the annual inspection interval proposed by the registrant. Bait cartridges did not experience a decomposition of the active ingredient and mold content did not influence the active ingredient. However, future comparisons should include an equal number of unaged bait cartridges and unaged blank cellulose cartridges.

MRID 50032005. Palatability of Field-Aged Trelona Compressed Termite Bait Using a Laboratory Bioassay.

(1) non-GLP

(2) **Methods:** Bait cartridges installed in Advance Termite Bait System (ATBS) stations as part of a structural efficacy study (see MRID 50032003 reviewed above) were collected after 12+ months. Cooperators collected cartridges that represented the highest and lowest (on a 1-4 scale) mold ratings and sent the

cartrdiges to the lab for analysis. Ten cartridges of the high rating (4) and ten cartridges of the low rating (1) were exposed to termites along with a single unaged bait cartridge and an unaged blank cellulose cartridge.

Feeding arenas consisted of 100 X 20 mm polystyrene dishes fill to ~ 5 mm depth with QuickStone Laboratory Stone. QuickStone was cured for 24 hours before adding 5 ml purified water to each arena. Each cartridge was cut into 4-6 sections. A single uniformly sized bait section (~0.25 g) was placed individually into modified 4 X 4 cm plastic weigh boats (two opposite side walls were cut out to allow termite access to the interior). A 5% agar plug was added to each arena as a water source. For each cartridge tested, this was replicated a minimum of four or a maximum of six times.

One hundred Formosan subterranean termites (*Coptotermes formosanus*) field collected from New Orleans, LA, were transferred to each arena. Termites were allowed to feed for 19 days, then assessed for mortality. Bait sections were weighed prior to termite introduction and again 56 days after termite consumption ended.

(3) **Results:** Mean consumption of TBC that had low fungal growth in the field was 0.046 (±0.029 SE) g. Mean consumption of TBC that had high fungal growth in the field was 0.051 (±0.038 SE) g. Mean consumption of unaged blank cartridges was 0.025 g and 0.020 g on unaged baited cartridges.

(4) **Conclusions: Acceptable.** There was no difference in the consumption of TBC that had high and low fungal growth in the field ($F_{1,112} = 0.4963$, $p = 0.8252$). While the design was unequal (future studies should ensure that an equal number of positive and negative controls are tested against the treated), consumption of unaged material was much lower on both baited and blank cartridges. The data support the annual inspection interval proposed by the registrant. Bait cartridges were similarly palatable to termites regardless of age or mold growth indicating that should subsequent termite colonies encounter the bait stations, the bait may be consumed.

IV. EXECUTIVE DATA SUMMARY:

The data provided support a one-year inspection interval when using two Trelona bait cartridges per station. Due to the >75% consumption of the two 93 g bait cartridges in six stations prior to the initiation of the annual inspection interval and the 32 stations at the termination of the study, both EPA and TLRC recommend that bait stations that will be transitioning to an annual inspection schedule should be baited with the two 124 g bait cartridges. This will ensure that enough bait is available for suppression of subsequent establishing colonies. Housing structures in ten states that were put on an annual inspection interval after an initial confirmation of termite presence in bait stations were certified termite free within the structure. The aged bait cartridges used in multiple housing structures were found to have similar novaluron content compared to unaged bait cartridges. In addition, the aged bait cartridges with high and low levels of mold growth were both palatable to termites and efficacious.

V. LABEL RECOMMENDATIONS:

(1) List changes to the directions for use.

Add the annual inspection interval using two 124 g bait cartridges.
See attached label for more detailed labeling comments.

(2) The following marketing claims are acceptable: n/a

(3) The following marketing claims are unacceptable: n/a

(4) The following MRIDs should be removed from the data matrix, as they are classified as “unacceptable” to support the product:

50032001

(5) Other comments/recommendations

Note to PM:

Currently, the label makes the marketing claims “Eliminates the colony,” “Provides on-going structural protection through colony elimination,” and “Continuous consumption of this bait by the colony members may result in the elimination of the colony.” The TLRC and entomologists at EPA suggest that the word “eliminate” is inaccurate given the data provided and misleading. We suggest that “eliminate” be replaced with “suppression” as the data in MRID 50032003 do suggest that the structures were free of termite infestations, but do not provide sufficient evidence that the extended colonies are not foraging in the surround area.

{Note to PM: Italicized text enclosed in "{ }" is information for the reviewer and not part of the label. [Bracketed information is optional text.] Text within brackets and separated by "/" denotes and/or options.}
{93 and 124 gram Cartridge Labels}

TC 283

Alternate Brand Names:
TRELONA® Compressed Termite Bait *{submitted via notification 04/16/2012}*
TRELONA® ATBS Direct Bait Kit *{submitted via notification 11/10/2014}*
TRELONA® ATBS Home Monitoring Kit *{submitted via notification 11/10/2014}*
TRELONA® ATBS Direct Bait Stations *{submitted via notification 12/11/2014}*
TRELONA® ATBS Annual Inspection Stations

NOT FOR INDIVIDUAL RESALE.

- Termite Bait Cartridge (TBC)
- For use by individuals/firms licensed or registered by the state to apply termiticide products. States may have more restrictive requirements regarding qualifications of persons using this product. Consult the structural pest control regulatory agency of your state prior to use of this product with questions you may have.
- A termite bait that may be used in an integrated management program for the protection of structures against subterranean termites.

ACTIVE INGREDIENT:

Novaluron: 1-[3-chloro-4-(1,1,2-trifluoro-2-trifluoro-methoxyethoxy) phenyl]-3-(2,6-difluorobenzoyl) urea	0.50%
OTHER INGREDIENTS:	99.50%
TOTAL:	100.00%

Contains 0.5 grams of novaluron per 100 grams of formulation
U.S. Patent No. 8,720,108

EPA Reg. No. 499-557 **EPA Est. No.**

KEEP OUT OF REACH OF CHILDREN
CAUTION/PRECAUCION

Refer to full label for **First Aid**, **Precautionary Statements**, **Directions For Use**, **Conditions of Sale and Warranty**, and state-specific use site restrictions.

NET WEIGHT:

BASF Corporation
26 Davis Drive
Research Triangle Park, NC 27709

BASF
We create chemistry

{Note to PM: Italicized text enclosed in "{ }" is information for the reviewer and not part of the label. [Bracketed information is optional text.] Text within brackets and separated by "/" denotes and/or options.}
{Complete Label}

TC 283

Alternate Brand Names:
TRELONA® Compressed Termite Bait *{submitted via notification 04/16/2012}*
TRELONA® ATBS Direct Bait Kit *{submitted via notification 11/10/2014}*
TRELONA® ATBS Home Monitoring Kit *{submitted via notification 11/10/2014}*
TRELONA® ATBS Direct Bait Stations *{submitted via notification 12/11/2014}*
TRELONA® ATBS Annual Inspection Stations

- For use by individuals/firms licensed or registered by the state to apply termiticide products. States may have more restrictive requirements regarding qualifications of persons using this product. Consult the structural pest control regulatory agency of your state prior to use of this product with questions you may have.
- A termite bait that may be used in an integrated management program for the protection of structures against subterranean termites.

ACTIVE INGREDIENT:

Novaluron: 1-[3-chloro-4-(1,1,2-trifluoro-2-trifluoro-methoxyethoxy) phenyl]-3-(2,6-difluorobenzoyl) urea	0.50%
OTHER INGREDIENTS:	99.50%
TOTAL:	100.00%

Contains 0.5 grams of novaluron per 100 grams of formulation
U.S. Patent No. 8,720,108

EPA Reg. No. 499-557 **EPA Est. No.**

KEEP OUT OF REACH OF CHILDREN
CAUTION/PRECAUCION

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
(If you do not understand the label, find someone to explain it to you in detail.)

Refer to full label for **First Aid**, **Precautionary Statements**, **Directions For Use**, **Conditions of Sale and Warranty**, and state-specific use site restrictions.

In case of an emergency endangering life or property involving this product, call day or night 1-800-832-HELP (4357).

NET WEIGHT:

BASF Corporation
26 Davis Drive
Research Triangle Park, NC 27709

BASF
We create chemistry

{Note to PM: Italicized text enclosed in "{ }" is information for the reviewer and not part of the label. [Bracketed information is optional text.] Text within brackets and separated by "/" denotes and/or options.} {Complete Label}

FIRST AID	
If in eyes	• Hold eyes open and rinse slowly and gently with water for 15 to 20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing. • Call a poison control center or doctor for treatment advice.
HOTLINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact BASF Corporation for emergency medical treatment information: 1-800-832-HELP (4357).	

Precautionary Statements

Hazards to Humans and Domestic Animals

CAUTION. Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet.

Environmental Hazards

The active ingredient in this product is extremely toxic to aquatic invertebrates. **DO NOT** place in any area where, because of the movement of water, it could be washed into a body of water containing aquatic life, such as ponds or streams.

Directions For Use

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

Read the **Product Information** and **Use Directions** carefully before using. This product is part of a termite baiting system and is intended for use in BASF approved bait stations which may be purchased from most professional pest control product distributors. When the system is inspected and replenished per label instructions, it provides on-going structural protection through colony elimination. Use of this bait in any other type of station or system not approved by BASF is prohibited. Call 1-800-777-8570 for assistance in using this product or any other components of the termite baiting system.

STORAGE AND DISPOSAL

DO NOT contaminate water, food or feed by storage or disposal.

Pesticide Storage

Store in original container in a dry storage area out of reach of children and animals.

Pesticide Disposal

Product not disposed of by use according to label directions should be wrapped in paper and placed in a trash can. If these wastes cannot be disposed of according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

Container Handling

Nonrefillable container. DO NOT reuse or refill this container. Offer for recycling if available. If recycling is not available, place container in trash.

In Case of Emergency

In case of large-scale spill of this product, call:

- CHEMTREC 1-800-424-9300
- BASF Corporation 1-800-832-HELP (4357)

In case of medical emergency regarding this product, call:

- Your local doctor for immediate treatment
- Your local poison control center (hospital)
- BASF Corporation 1-800-832-HELP (4357)

Product Information

Continued consumption of this bait by colony members may ultimately result in the elimination of the colony. ~~Adherence to the **Use Directions** can increase the likelihood of colony elimination; however,~~ conditions or circumstances beyond the control of the user (competing insects, flooding events, cold weather, presence of alternative food sources, etc.) may prevent or substantially delay colony elimination.

{Note to PM: Italicized text enclosed in "{ }" is information for the reviewer and not part of the label. [Bracketed information is optional text.] Text within brackets and separated by "/" denotes and/or options.}
{Complete Label}

Station Installation

Install stations around a structure such that, except where sufficient access to the ground is not available, the maximum interval between any two stations does not exceed 20 feet. If the distance between 2 points of accessible ground around the structure exceeds 30 feet, it may be advisable to form 1 or more openings in the inaccessible surface to facilitate baiting between the accessible areas.

To install a station, excavate a hole in the ground approximately the same size and dimensions as those of the station. Insert the station and maximize contact between the exterior of the station and the soil. This will increase the probability of termite entrance into the station. If the station is inserted into an opening created through a hardened construction surface (such as concrete, asphalt, etc.), insert station below the surface (in contact with the ground) and seal securely.

Install stations within approximately 5 feet of points of known, probable, or suspected termite foraging activity and in other areas that provide conditions conducive to termite activity. Such areas may include concentrations of cellulose-containing debris in contact with the ground, such as mulch, wood scraps, areas of moderate soil moisture, shaded areas, areas containing plant root systems, bath traps, visible termite foraging tubes, etc. Relocate or modify the station location to prevent water from collecting in the station by, for example, creating a sump area under the installed station or at the bottom of the cavity. If termites have permanently abandoned the station due to excessive moisture, remove the saturated bait and re-bait the station with fresh bait at that time or after the excess moisture condition has abated.

If the structure has an accessible crawl space, stations can be installed in the crawl space in lieu of or in addition to installing stations around the exterior of the structure. Stations can be installed within a slab structure in existing or created openings in the slab surface through which ground is accessible and into which the station can be installed in a secure manner.

Once termite activity has occurred at a station and bait consumption has begun, it may be advisable, depending on the rate of bait consumption in that station and nearby stations, to install 1 or more supplemental stations in the immediate vicinity (up to 5 feet) of the infested station(s) in order that bait consumption by the colony be maximized.

Use Directions

Pre-construction Use

In Florida, DO NOT use as a stand-alone preventative treatment for new construction. This product can be used for preventative treatment (before signs of infestation) of new structures (as a substitute for, and in lieu of, pre-construction soil treatment). [In *{insert state name(s)}*, where pre-construction use of bait only is prohibited, this product may be used in conjunction with, but not in lieu of, pre-construction soil treatment.] Place stations around the outside of the structure only after the final exterior grade is established (and preferably after landscaping is completed).

Post-construction Use

This product can be used for remedial treatment of infested existing structures and/or for preventative treatment (before signs of infestation) of existing structures.

Pre-baiting/Direct Baiting

Pre-baiting is a process by which termite activity is established at a location prior to the application of bait at that location. Use BASF approved pre-bait to establish activity in the station. If there is termite activity in a pre-baited station, make bait continuously available for colony consumption by placing this product in the station and replenishing consumed amounts of bait for as long as termite activity is present in the station. Refer to **Table 1. Inspection Intervals by Cartridge Size** for details.

Alternatively, this product can be placed in stations at any time prior to termite activity (direct baiting), with or without the presence of termites. Refer to **Table 1. Inspection Intervals by Cartridge Size** for details.

{Note to PM: Italicized text enclosed in "{ }" is information for the reviewer and not part of the label. [Bracketed information is optional text.] Text within brackets and separated by "/" denotes and/or options.} {Complete Label}

Table 1. Inspection Intervals by Cartridge Size

Inspection Interval	Cartridges Required	After 1 Year with No Termite Activity
[90 Days]	[One 93 gram cartridge]	[Inspect every 6 months.]
120 Days	One 124 gram cartridge	Inspect every 6 months.
Annual	**Every bait station must contain:** Two 93 gram cartridges **OR** One 93 gram cartridge + One 124 gram cartridge **OR** Two 124 gram cartridges	Continue to inspect on an annual basis.

Inspection intervals must comply with state regulations where applicable.

Shorter inspection intervals may be warranted if termite activity indicates complete consumption of the bait in a station before the scheduled inspection.

Inspections cannot take place more than 30 days beyond the required interval unless cold temperatures persist (average daily mean exterior air temperature below 50°F). Termite feeding activity is typically reduced under low temperature conditions making it difficult to accurately assess termite activity. The operator should always make allowances for local circumstances when considering increasing elapsed time between inspections.

- **DO NOT** allow more than 6 months to pass between inspections for the [90 and/or 120] day inspection interval[s].
- **DO NOT** allow more than 15 months to pass between inspections for the annual inspection interval.

Inspecting Stations and Replacing Bait

To inspect a station, remove the cover and visually examine the cartridges for the presence of termites, being careful to minimize disturbance in the case that termites are present. If it appears that >1/3 of a bait cartridge in the station has been consumed, replace that cartridge with a new cartridge. If termites are not present, inspect bait for excessive decay. Replace excessively decayed bait and securely close the station cover.

Transitioning from [90 Day and/or 120 Day] to Annual Inspection Interval

Alternatively, stations on a [90 day and/or 120 day] inspection interval may be switched to an annual inspection interval if every bait station around the structure contains two **Trelona® Compressed Termite Bait** cartridges. All stations around the structure must contain two **Trelona Compressed Termite Bait** cartridges or the inspection period cannot exceed [90 days and/or 120 days] [depending on the cartridge size]. Inspection of bait treatments made with this product must be done according to the inspection intervals listed in **Table 1. Inspection Intervals by Cartridge Size**.

Non-structure Spot Treatment

This product can also be applied or used as a spot treatment in areas not associated with structures or buildings, such as around trees, wood piles, landscaping elements, railroad track beds, at the edge of property lines and other areas where termite activity is known or suspected. Such treatments may be made alone or in combination with an additional method of termiticide treatment. To provide a non-structure spot treatment, install one or more bait station(s) in the soil at or near points of known or suspected termite activity. Non-structure spot treatment baiting may be discontinued at any time at the discretion of the applicator. Inspection of bait treatments made with this product must be done according to the inspection intervals listed in **Table 1. Inspection Intervals by Cartridge Size**.

Supplemental Treatments

If a soil-applied liquid or granular termiticide treatment is performed in conjunction with installation of the bait system, **DO NOT** treat the area where stations are installed (preferably not within 2 feet of stations). Because the use of bait may be a multi-step process, localized treatment(s) of areas of the structure infested with active termites at the time of baiting, using soil applied termiticides, may provide more immediate control of termites in those parts of the structure than baiting alone. Preventative spot treatments to critical areas of soil or wood may be performed in conjunction with station installation. It is advisable not to treat directly on top of installed stations during routine general pest/perimeter applications.

This product can be applied or used as a supplemental treatment in, underneath, and/or around structures or buildings to kill termites in support of or as a supplement to a termiticide product labeled for and applied as a standalone termiticide treatment. This includes pre- and post-construction soil termiticide treatments labeled for providing structural protection. This product may also be used in combination with an additional termiticide treatment as a supplemental treatment in areas not associated with structures or buildings, such as around trees, wood piles, landscaping elements, railroad track beds, and

other areas where termite activity is known or suspected. Inspection of bait treatments made with this product must be done according to the inspection intervals listed in **Table 1. Inspection Intervals by Cartridge Size**.

Conditions of Sale and Warranty

The **Directions For Use** of this product reflect the opinion of experts based on field use and tests. The directions are believed to be reliable and must be followed carefully. However, it is impossible to eliminate all risks inherently associated with the use of this product. Ineffectiveness or other unintended consequences may result because of such factors as environmental conditions, presence of other materials, or use of the product in a manner inconsistent with its labeling, all of which are beyond the control of BASF CORPORATION ("BASF") or the Seller. To the extent consistent with applicable law, all such risks shall be assumed by the Buyer. BASF warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes referred to in the **Directions For Use**, subject to the inherent risks, referred to above. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW: (A) BASF MAKES NO OTHER WARRANTIES EXPRESS OR IMPLIED, INCLUDING WARRANTIES OF FITNESS FOR PARTICULAR PURPOSE OR MERCHANTABILITY, (B) BUYER'S EXCLUSIVE REMEDY AND BASF'S AND SELLER'S EXCLUSIVE LIABILITY, WHETHER IN CONTRACT, TORT, NEGLIGENCE, STRICT LIABILITY, OR OTHERWISE, SHALL BE LIMITED TO REPAYMENT OF THE PURCHASE PRICE OF THE PRODUCT, AND (C) BASF AND THE SELLER DISCLAIM ANY LIABILITY FOR CONSEQUENTIAL, INCIDENTAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.** BASF and the Seller offer this product, and the Buyer and User accept it, subject to these **Conditions of Sale and Warranty** which may be varied only by agreement in writing signed by a duly authorized representative of BASF. PCS915

Trelona *is a registered trademark of BASF.*

000499-00557.20161114.**NVA 2016-04-466-0186**
Supersedes: NVA 2015-04-466-0181
Supplemental: NVA 2016-04-466-0255

BASF Corporation
26 Davis Drive
Research Triangle Park, NC 27709

We create chemistry